U.S. ENVIRONMENTAL PROTECTION AGENCY
POLLUTION/SITUATION REPORT
Warren Steel Holdings (OPA) - Removal Polrep
Final Removal Polrep

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region V

Subject: **POLREP #3**
Final
Warren Steel Holdings (OPA)
Z5SG
Warren, OH
Latitude: 41.2710670 Longitude: -80.8391684

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From: Stephen Wolfe, On-Scene Coordinator
Date: 10/3/2018
Reporting Period: 09/24/2018 through 10/02/2018

1. Introduction

1.1 Background

Site Number:	Z5SG	**Contract Number:**	
D.O. Number:		**Action Memo Date:**	
Response Authority:	OPA	**Response Type:**	Time-Critical
Response Lead:	EPA	**Incident Category:**	Removal Action
NPL Status:	Non NPL	**Operable Unit:**	
Mobilization Date:	8/15/2018	**Start Date:**	8/15/2018
Demob Date:	10/2/2018	**Completion Date:**	10/2/2018
CERCLIS ID:		**RCRIS ID:**	
ERNS No.:		**State Notification:**	Y
FPN#:	E18519	**Reimbursable Account #:**	

1.1.1 Incident Category

Time-Critical Removal Action (OPA)

Abandoned transformers located near the banks of the Mahoning River (non-PCB)

note: CERCLA work is occurring simultaneously at the site (https://response.epa.gov/WSH)

1.1.2 Site Description

The Warren Steel Holding Site is a 400-acre abandoned steel facility. The OPA portion of the site is located on the south side of North River Road and includes the main sub-station for the facility. There are approximately 45 transformers and 200 capacitors (oil volume approximately 60,000 gallons) located less than 200 feet from the Mahoning River. When the facility was operating, lagoons were constructed to keep material from entering the Mahoning River; however, since the facility was shut down, the lagoons have not been and are not being maintained, therefore, releases from the transformers and capacitors from the substation pose a direct threat to the Mahoning River.

1.1.2.1 Location

The substation is located on the south side of North River Road near 4000 Mahoning Avenue, Warren, Trumbull County, Ohio. The substation does not have a distinct physical address. The geographical coordinates of the substation are 41º 16’ 03.43” north and -80º 50’ 59.09” west.

1.1.2.2 Description of Threat

The Warren Steel Facility is no longer an operating facility and the transformer substation is not operating. Although there are guards present at the main facility, inspections consist of a simple drive-by and releases from the transformers would not be observed by the guards. The substation is located less than 200 feet from the banks of the Mahoning River and any release from the transformers would reach the river.

1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

EPA sampled all the transformers in the substation in June 2018. The transformer specialist who sampled all the transformers rated the transformers in poor condition. Sampling indicated that 7 of the transformers would be considered "PCB contaminated" (greater than 50 ppm PCBs) and those transformers will be addressed under the ongoing CERCLA action at the site. There is approximately 60,000 gallons of non-PCB oil located in the transformers and 1,000 gallons of oil located in the capacitors. In addition to the substation, one tank containing a petroleum material is located at one of the outfalls of the facility which leads to the Mahoning River (approximately 3,000 gallons oil).

2. Current Activities

2.1 Operations Section

2.1.1 Narrative

For the reporting period, ERRS and their subcontractor completed draining oil from large transformers and completely removed smaller transformers of oil. In addition all oil-filled capacitors and two drums of oil found located after brush was cleared was removed. NOTE: there were 7 transformers located at the substation that were above 50 ppm PCBs. These transformers were addressed under the CERCLA action for the site.

2.1.2 Response Actions to Date

On Monday September 24th, one tanker truck (3,500 gallons) of less than 50 ppm PCB oil was removed from transformers and 6 oil filled transformers (less than 50 ppm pcb) were removed from the site . The oil and transformers were taken to the subcontractor's facility in Twinsburg, Ohio for recycling (low level PCB removal/recycling). The subcontractor continued dismantling other transformers/capacitors in preparation for removal.

On Tuesday September 25th, 12 oil filled transformers (less than 50 ppm pcb) were removed from the site . The transformers were taken to the subcontractor's facility in Twinsburg, Ohio for recycling (low level PCB removal/recycling). The subcontractor continued dismantling other transformers/capacitors in preparation for removal.

On Wednesday September 26th, 11 oil filled transformers (less than 50 ppm pcb) were removed from the site . The transformers were taken to the subcontractor's facility in Twinsburg, Ohio for recycling (low level PCB removal/recycling). The subcontractor continued dismantling other transformers/capacitors in preparation for removal.

On Thursday September 27th, 13 oil filled transformers, 253 oil filled capacitors, 6 oil filled bushings (less than 50 ppm pcb) and 2 drums of oil were removed from the site . The oil and transformers were taken to the subcontractor's facility in Twinsburg, Ohio for recycling (low level PCB removal/recycling). The capacitors will be sent for incineration/landfilling. The subcontractor continued dismantling other transformers in preparation for removal.

On Friday September 28th, no work occurred at the substation.

On Tuesday, October 2, EPA and ERRS performed a final site walk of the substation and removed all tools/equipment and site support utilities from the substation area.

2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

Ongoing

2.1.4 Progress Metrics

Waste Stream	***Medium***	***Quantity***	***Manifest #***	***Treatment***	***Disposal***
petroleum material	liquid	3,000 gallons	BOL 01676	disposal	Safety-Kleen Systems, Kent, Ohio
transformer oil (less than 50 ppm PCBs)	liquid	47,000 gallons	multiple BOLs	treatment/recycling	Emerald Transformer PPM, LLC. Twinsburg, Ohio
transformer carcasses	solid	90 tons	multiple BOLs	recycling	Emerald Transformer PPM, LLC. Twinsburg, Ohio
Oil Filled Capacitors	solid	253 units	BOL 867323	incineration/landfill	Emerald Transformer PPM, LLC. Twinsburg, Ohio

Regional Metrics

This is an Integrated River Assessment. The numbers should overlap.	Miles of river systems cleaned and/or restored	NA
	Cubic yards of contaminated sediments removed and/or capped	NA
	Gallons of oil/water recovered	NA
	Acres of soil/sediment cleaned up in floodplains and riverbanks	NA

Stand Alone Assessment	Number of contaminated residential yards cleaned up	NA
	Number of workers on site	4
Contaminant(s) of Concern	Mineral oil	
Oil Response Tracking		
Estimated volume	Initial amount released	0
	Final amount collected	46,687 gallons
CANAPS Info	FPN Ceiling Amount	315,000
	FPN Number	E18519
	Body of Water affected	Mahoning River

Administrative and Logistical Factors (Place X where applicable)		
Precedent-Setting HQ Consultations (e.g., fracking, asbestos)	Community challenges or high involvement	Radiological
More than one PRP	Endangered Species Act / Essential Fish Habitat issues	Explosives
AOC	Historic preservation issues	Residential impacts
UAO	NPL site	Relocation
DOJ involved	Remote location	Drinking water impacted
Criminal Investigation Division involved	Extreme weather or abnormal field season	Environmental justice
Tribal consultation or coordination or other issues	Congressional involvement	High media interest
Statutory Exemption for $2 Million	Statutory Exemption for 1 Year	Active fire present
Hazmat Entry Conducted – Level A, B or C	Incident or Unified Command established	Actual air release (not threatened)

Green Metrics

Metric	Amount	Units
Solid waste recycled - Oil	46,687	gallons
Solid waste recycled - metal (transformer)	89.2	tons

2.2 Planning Section

2.2.1 Anticipated Activities

None - Action Complete

2.2.1.1 Planned Response Activities

None - Action Complete

2.2.1.2 Next Steps

None- Action Complete

2.2.2 Issues

While preparing transformers for removal, it was discovered that someone had stolen one of the transformers sometime between September 1 and September 24. EPA and START and marked transformers that were above 50 ppm PCBs so they would be kept separate. One marked transformer (approximately 200 pounds) that was located on the ground could not be located.

further investigation indicated a lock was cut off of a gate.

In addition to the transformer, metal from dismantling the transformers was stolen the next day. Further investigation indicated that the lock mechanism was completely removed from a gate.

Site Security for Warren Steel (hired by an attorney for Warren Steel) was notified of the incidents and they filed a police report.

ERRS secured all 3 gates to the substation with chains and no further theft was identified.

on the final site walk a hole was noticed in the fence for the substation and EPA informed the Site Security for Warren Steel.

2.3 Logistics Section

ERRS is providing all logistics

2.4 Finance Section

2.4.1 Narrative

On June 4, 2018 FPN E18519 was opened for $25,000 for the project for initial work.

On July 20, 2018 an OPA 90 Project Plan was approved by the USCG National Pollution Fund Center increasing the ceiling to $315,000.

Note: the subcontractor is giving a credit of $0.56 per gallon for the re-usable oil. A credit for the recyclable transformer material (copper/steel/aluminum) will also be given for all transformers removed from the site. These credits will be applied to the total cost of the project. Total to date is estimated based on the original project bid.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	$200,000.00	$65,000.00	$135,000.00	67.50%
TAT/START	$25,000.00	$9,000.00	$16,000.00	64.00%
Intramural Costs				
USEPA - Direct	$44,392.00	$11,000.00	$33,392.00	75.22%
USEPA - InDirect	$45,608.00	$12,596.00	$33,012.00	72.38%
Total Site Costs	$315,000.00	$97,596.00	$217,404.00	69.02%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

2.5 Other Command Staff

2.5.1 Safety Officer

EPA and ERRS RM are fulfilling this role.

ERRS subcontractor provided a safety plan detailing their work including working from heights and hot work permits.

2.5.2 Liaison Officer

2.5.3 Information Officer

3. Participating Entities

No information available at this time.

4. Personnel On Site

EPA 1
START 1
ERRS (including subcontractors) 4

5. Definition of Terms

No information available at this time.

6. Additional sources of information

6.1 Internet location of additional information/report

https://response.epa.gov/WSHOPA

for CERCLA related work at the site including PCB contaminated transformers
https://response.epa.gov/WSH

6.2 Reporting Schedule

7. Situational Reference Materials

No information available at this time.